

Via ECFS

March 26, 2015

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street S.W.
Washington, DC 20554

Re: CC Docket No. 86-182
2014 ARMIS Reports of Hawaiian Telcom Communications, Inc.

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission's *Revisions to ARMIS Filing Procedures Order* (DA 14-1387), released September 24, 2014, Hawaiian Telcom, Inc. ("HTI") hereby submits its entire 2014 ARMIS Filing. This filing consists of Reports 43-01 and 43-08, and the required Part 64 Certification.

HTI requests that the Commission keep the following information included in Report 43-01, Table 1 confidential and not release the information to the public: columns (c) Nonregulated, (d) Adjustments, (f) Subject to Separations, (g) State, (h) Interstate, (m) Common Line, (n) Traffic Sensitive Switching, (p) Traffic Sensitive Transport, (r) Traffic Sensitive Total, (s) Special Access, (u) Billing & Collection, and (v) Interexchange.

Statement pursuant to 47 C.F.R. § 0.459(b)

(1) Identification of the specific information for which confidential treatment is sought.

Confidential treatment is sought for data regarding specific breakdown of cost and revenue information by jurisdiction, by traffic sensitive access elements, by special access elements, by billing and collection services, and by interexchange services.

(2) Identification of the Commission proceedings in which the information was submitted or a description of the circumstances giving rise to the submission.

HTI is providing the confidential information identified above in response to the above-mentioned *Revisions to ARMIS Procedures Order*.

Ms. Marlene Dortch
March 26, 2015
Page 2

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The information contained in the attachments includes confidential financial information which is not otherwise publicly available from public sources, and would be useful to any competitor in determining how to compete with HTI in its offering of telecommunications services.

(4) Explanation of the degree to which the information concerns a service that is subject to competition.

There is significant competition among telecommunications providers in the State of Hawaii.

(5) Explanation of how disclosure of the information could result in substantial competitive harm.

HTI's competitors could use the confidential and proprietary financial information in determining the pricing for services they offer to the public, therefore having an advantage in offering telecommunications services to the public.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

This information has been maintained on a confidential basis in company files that are not ordinarily accessible by the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The information would not ordinarily be disclosed to parties outside HTI, except to government agencies pursuant to an HTI request for confidentiality.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.

The material should be withheld from public disclosure as long as the data in question would provide a basis for competitors to gain insight into the financial information associated with HTI's telecommunications services.

Ms. Marlene Dortch
March 26, 2015
Page 3

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

Under applicable Commission and court rulings, the subject material must be kept free from public disclosure. Exemption 4 of the Freedom of Information Act shields information which is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. *See Washington Post Co. v. U.S. Department of Health and Human Services*, 690 F.2d 252, 266 (D.C. Cir. 1982). The attached information clearly satisfies the first two elements of that test. With respect to the third element of the above test, information is considered to be "confidential" if disclosure is likely, *inter alia*, to harm substantially the competitive position of the person from which the information was obtained. *National Park and Conservation Ass'n. v. Morton*, 498 F. 2d 765, 770 (D.C. Cir. 1974). As explained above, disclosure of the information would result in competitive harm because it would enable rivals to learn the financial details associated with HTI's telecommunications offerings. Moreover, the data are "of a kind that the provider would not customarily release to the public." *Critical Mass Energy Project v. NRC*, 975 F.2d 871 (D.C. Cir. 1992).

If there are any questions regarding this matter, please contact Keith Yoshino at 808/546-7868, or at keith.yoshino@hawaiiantel.com.

Sincerely,



Steven P. Golden
Vice President, External Affairs

Enclosures